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2 Attorney at Law

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8 Attorney for Defendant

9 **WILLIAM HAMMAN**

10 **UNITED STATES DISTRICT COURT**

11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 (Hon. Barry Ted Moskowitz)

13 UNITED STATES OF AMERICA

14 Plaintiff,

15 vs.

16 PETER CARLO MERTENS, et al.,

17 Defendant.

CASE NO. 08CR0440-BTM

**JOINT MOTION TO CONTINUE
MOTION HEARING**

Date: June 20, 2008

Time: 1:30 p.m.

18 COMES NOW the plaintiff, United States of America, by and through its counsel,
19 Karen P. Hewitt, United States Attorney, and Sherri W. Hobson, Assistant United States
20 Attorney, and defendants William Hamman, through his counsel Frank J. Ragen; Peter
21 Carlo Mertens, through his counsel, Patrick Q. Hall; Wayne Joseph Fernandes, through
22 his counsel, Dorn G. Bishop; and Bettina Thakore, through her counsel, Lisa J. Damiani;
and hereby jointly request the Court continue the Motion Hearing previously scheduled
for June 20, 2008, at 1:30 p.m. to September 19, 2008, at 2:00 p.m.

23 This continuance is requested since Defense Counsel has not yet received all
24 discovery in this case. Thousands of pages of discovery are to be produced along with
25 video and Grand Jury testimony. Counsel needs this time to adequately study discovery
26 and write the motions.
27
28

Respectfully submitted,

Dated: June 6, 2008

s/Frank J. Ragen
FRANK J. RAGEN
Attorney for Defendant
WILLIAM HAMMAN

Dated: June 6, 2008

s/Patrick Q. Hall
PATRICK Q. HALL
Attorney for Defendant
PETER CARLO MERTENS

Dated: June 6, 2008

s/Dorn G. Bishop
DORN G. BISHOP
Attorney for Defendant
WAYNE JOSEPH FERNANDES

Dated: June 6, 2008

s/Lisa J. Damiani
LISA J. DAMIANI
Attorney for Defendant
BETTINA THAKORE

Dated: June 6, 2008

s/Sherri W. Hobson
SHERRI W. HOBSON
Assistant United States Attorney
Attorney for Plaintiff
UNITED STATES OF AMERICA

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF CALIFORNIA
3 (Hon. Barry Ted Moskowitz)

4 UNITED STATES OF AMERICA) CASE NO. 08CR0440-BTM
5 Plaintiff,) CERTIFICATE OF SERVICE
6 vs.)
7 PETER CARLO MERTENS, et al.,)
8 Defendant.)

9 IT IS HEREBY CERTIFIED THAT:

10 I, LUCIA SANCHEZ, am a citizen of the United States and am at least eighteen
11 years of age. My business address is 105 West F Street, Ste. 215, San Diego, California,
12 92101.

13 I am not a party to the above-entitled action. I hereby certify that I have caused
14 to be served **JOINT MOTION TO CONTINUE MOTION HEARING** to the
15 following ECF participants on this case:

16
17 **Dorn G Bishop**
dorn@dornbishoplaw.com,kstarrj@yahoo.com

18
19 **Lisa J Damiani**
ljdiani@damianilawgroup.com,Comp1@damianilawgroup.com

20
21 **Patrick Q Hall**
hall@scmv.com,flores@scmv.com

22
23 **Sherri Walker Hobson**
Sherri.Hobson@usdoj.gov,melissa.d.johnson@usdoj.gov,efile.dkt.nes@usdoj.gov

24 I declare under penalty of perjury that the foregoing is true and correct.

25
26 Executed on June 6, 2008.

27 LUCIA SANCHEZ
28 LUCIA SANCHEZ